

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CEMENT MASONS' UNION LOCAL NO. 592	:	
PENSION FUND, et al.	:	
	:	
Plaintiffs	:	CIVIL ACTION
v.	:	NO. 02-CV-4715
	:	
NET CONSTRUCTION, INC. and	:	
CHRISTOPHER COLLETTI	:	
	:	
Defendants	:	

REQUEST TO ENTER DEFAULT PURSUANT TO F.R.C.P. 55(a)

You will please enter a default on Defendants Net Construction, Inc. and Christopher Colletti for failure to plead or otherwise defend the Complaint filed on July 17, 2002 and served on the Defendants on November 23, 2002 as provided in Rule 55(a) of the Federal Rules of Civil Procedure as appears in the attached Declaration of Shelley R. Goldner.

Respectfully submitted,

JENNINGS SIGMOND, P.C.

BY: /s/ SHELLEY R. GOLDNER

SHELLEY R. GOLDNER, ESQUIRE
(Attorney I.D. No. 32896)
The Penn Mutual Towers, 16th Floor
510 Walnut Street, Independence Square
Philadelphia, PA 19106-3683
(215) 351-0644
Attorney for Plaintiffs

DATED: January 8, 2003

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EASTERN DISTRICT OF PENNSYLVANIA**

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PENSION FUND, et al.	:	
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Plaintiffs	:	CIVIL ACTION
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	:	
NET CONSTRUCTION, INC. and	:	
CHRISTOPHER COLLETTI	:	
	:	
Defendants	:	

DECLARATION OF SHELLEY R. GOLDNER, ESQUIRE
FOR ENTRY OF DEFAULT

Shelley R. Goldner, Esquire, having been first duly sworn according to law, hereby deposes and states as follows:

1. I am the attorney for the Plaintiffs in the above-entitled action.
2. The Complaint and Summons in this action were served on the Defendants Net Construction, Inc. and Christopher Colletti by Talone & Associates, Process Server, who served the Defendants by handing the Summons and Complaint to Christopher Colletti, Owner, at 1130 Church Road, Wyncote, Pennsylvania 19095 on November 23, 2002 as appears from the Affidavits of Service of the Complaint which have been docketed with the Court.
3. The time in which the Defendants may answer or otherwise move as to the Complaint has expired.
4. The Defendants have not answered or otherwise moved and the time for Defendants to

answer or otherwise move has not been extended.

5. The Defendants are neither infants nor incompetent persons and are not in the military service.

I declare under penalty of perjury in accordance with
28 U.S.C. §1746 that the foregoing is true and correct
to the best of my knowledge, information and belief

Executed on: January 8, 2003

s/SHELLEY R. GOLDNER
SHELLEY R. GOLDNER, ESQUIRE

CERTIFICATE OF SERVICE

I, SHELLEY R. GOLDNER, ESQUIRE, state, under penalty of perjury, that the foregoing Request to Enter Default Pursuant to F.R.C.P. 55(a) was served by mailing same first class mail, postage prepaid, on the date listed below to:

Net Construction, Inc.
1130 Church Road
Wyncote, Pennsylvania 19095

and

Christopher Colletti
1130 Church Road
Wyncote, Pennsylvania 19095

s/SHELLEY R. GOLDNER
SHELLEY R. GOLDNER, ESQUIRE

DATE: January 8, 2003

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